

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

KHARI R. MCBRIDE,
Plaintiff,

v.

NO. 3:22-CV-381

FURROW AUTOMOTIVE, INC.
d/b/a, MERCEDES BENZ OF KNOXVILLE,
MENDEE HOPPER,
TOM KAJITANI, and
DARRELL LITTRELL,
Defendants.

STIPULATED PROTECTIVE ORDER

Pursuant to the Joint Motion of the parties herein and for good cause shown:

IT IS HEREBY ORDERED AS FOLLOWS:

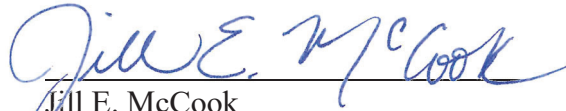
1. All documentary information produced or exchanged in the course of discovery in this litigation that contains financial, personnel information, business, customer, personal, credit, private medical, tax, corporate policies or business strategies, or other similar confidential information that is so designated by either party to this litigation by stamping “Confidential” on each such document by the producing party, shall be deemed *confidential information*.
2. *Confidential information* shall be used solely for the purpose of this litigation **and shall not (except by further order of this Court) be given, shown, made available, discussed or otherwise communicated to anyone other than:** attorneys of records; inside counsel and employees of a party working directly on this litigation; persons retained to assist in the preparation of this litigation; the Court and its staff; and parties to this litigation and other witnesses to the extent necessary for the preparation of their testimony or during their

depositions; provided, however, that in all such situations and prior to making the disclosure, the party making such disclosure is required to first obtain the written agreement in the form attached as Exhibit A and signed by any such person to whom disclosure is made so as to be bound to the terms of this Order. Any party, whether through counsel or as a *pro se* party showing any documents stamped by the other party as “Confidential” or sharing information from said documents will maintain a list of individuals to whom such documents or information was provided and upon request, will provide a copy of the list to opposing counsel at the conclusion of this litigation.

3. This Order does not apply to the use of such *confidential information* during the course of trial, during conducting of discovery depositions, or any Court hearing in this case.
4. The parties shall agree on a procedure for the return to the producing party of documents containing *confidential information*.
5. A time-stamped copy of this Order as entered shall be treated as an original.

IT IS SO ORDERED.

ENTER:


Jill E. McCook
United States Magistrate Judge

CONSENTED TO AND APPROVED FOR ENTRY:

FURROW AUTOMOTIVE, INC.
d/b/a, MERCEDES BENZ OF KNOXVILLE,
MENDEE HOPPER,
TOM KAJITANI, and
DARRELL LITTRELL,
Defendants.

s/Howard B. Jackson
Howard B. Jackson, (BPR #021316)
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(approved as reflected from attached Ex.3 filed with Joint Motion)
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ATTACHMENT A

I, _____, being duly sworn, state that:

1. My present address is _____.
2. I have received a copy of the Protective Order in this action. I have carefully read and understand the provisions of the Protective Order.
3. I will comply with all of the provisions of the Protective Order. I will hold in confidence, will not disclose to anyone not qualified under the Protective Order, and will use only for purposes of this action, any CONFIDENTIAL MATERIAL, including the substance and any copy, summary, abstract, excerpt, index or description of such material, that is disclosed to me.
4. I will return all CONFIDENTIAL MATERIAL that comes into my possession, and all documents and things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained or from whom I received such material when requested to do so.

[Signature]

Sworn and subscribed to before me this ____ day of _____, 202_.

Notary Public

My Commission expires: